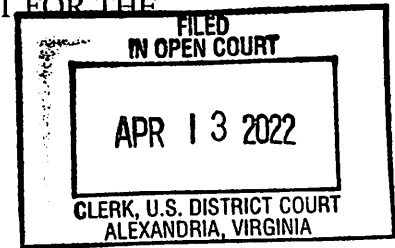


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

PETER LE

JOSEPH DUK-HYUN LAMBORN

TONY MINH LE

YOUNG YOO

Defendants.

No. 1:19-cr-57

The Honorable Liam O'Grady

Trial Date: April 11, 2022

**STIPULATION CONCERNING DNA ANALYSIS
AND CHAIN OF CUSTODY**

The United States of America, by Jessica D. Aber, United States Attorney for the Eastern District of Virginia, James L. Trump, Carina A. Cuellar, and Ryan B. Bredemeier, Assistant United States Attorneys and the defendants Peter Le, Joseph Duk-Hyun Lamborn, Tony Minh Le, and Young Yoo, through counsel, for purposes of trial stipulate as required and appropriate to the authenticity, foundation, and proper chain of custody, for the following United States exhibit, testimony, and facts:

1. Virginia Department of Forensic Science Certificate of Analysis FS Lab #C19-14970, dated December 19, 2019 (Government Exhibit 27-6) contains deoxyribonucleic acid (DNA) analysis results comparing two pieces of evidence referred to as "Item 1" and "Item 2." Item 1 is the femur bone of unidentified remains collected by law enforcement on or about December 5, 2019, in a wooded area near the address of 800 Old Locke Lane, Richmond, Virginia, 23226. Item 2 is Government Exhibit 27-5, which is a Buccal sample containing a

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DNA sample of Khairina Worthey, who is the biological mother of Brandon White.

2. On or about December 9, 2019, the Virginia Department of Forensic Science Central Laboratory in Richmond, Virginia, received Item 1 and Item 2 for analysis. Proper chain of custody of Items 1 and 2 were maintained at all times. When Items 1 and 2 were tested by the Virginia Department of Forensic Science, they were in the same condition as when collected by law enforcement, and the items had not been tampered with.

3. On or about December 18, 2019, Forensic Scientist Stephen E. Rodgers completed his analysis comparing the DNA profile from the femur bone (Item 1) to the DNA profile of Government Exhibit 27-5 (Item 2, Buccal DNA sample from Khairina Worthey) using recognized and reliable methods. The results of that analysis are reflected in the Government Exhibit 27-6.

4. Government Exhibit 27-6 accurately summarizes Rodger's findings, namely that Khairina Worthey cannot be eliminated as the biological parent (mother) of the donor of the femur of the unidentified remains.

5. The Probability of Maternity, which expresses the probability that Khairina Worthey is the biological parent (mother) of the donor of the femur of the unidentified remains, was calculated. The Probability of Maternity in the Caucasian population is 99.9999%. The Probability of Maternity in the African American population is 99.9996%. The Probability of Maternity in the Hispanic population is 99.9998%.


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So stipulated.

ON BEHALF OF THE GOVERNMENT:

Jessica D. Aber
United States Attorney


By:



James L. Trump
Carina A. Cuellar
Ryan B. Bredemeier
Assistant United States Attorneys

ON BEHALF OF THE DEFENDANT:

Peter Le

By:

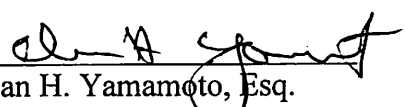

Lana Manitta, Esq.
Jesse Winograd, Esq.
Counsel for Peter Le

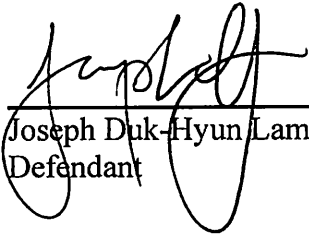

Peter Le
Defendant

ON BEHALF OF THE DEFENDANT:

Joseph Duk-Hyun Lamborn

By:

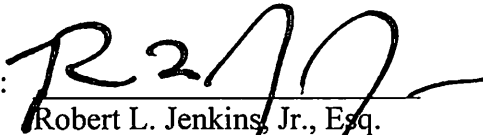

Alan H. Yamamoto, Esq.
Pleasant Sanford Brodnax, III, Esq.
Counsel for Joseph Duk-Hyun Lamborn


Joseph Duk-Hyun Lamborn
Defendant

United States v. Peter Le et al, 1:19-cr-57
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ON BEHALF OF THE DEFENDANT:

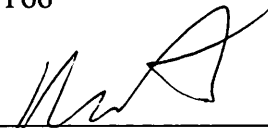
Tony Minh Le


By: 
Robert L. Jenkins, Jr., Esq.
Counsel for Tony Minh Le


Tony Minh Le
Defendant

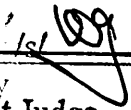
ON BEHALF OF THE DEFENDANT:

Young Yoo

By: 
Frank Salvato, Esq.
Christopher Amolsch, Esq.
Counsel for Young Yoo


Young Yoo
Defendant

So ORDERED April 13, 2022



Liam O'Grady, Clerk
United States District Judge